

OBER | KALER
A Professional Corporation

Ober, Kaler, Grimes & Shriver
Attorneys at Law

120 East Baltimore Street
Baltimore, MD 21202-1643
410-685-1120 / Fax 410-547-0699
www.ober.com

M. Hamilton Whitman, Jr.
mhwhitman@ober.com
410-347-7354

Offices In
Maryland
Washington, D.C.
Virginia

March 7, 2006

BY ELECTRONIC FILING

The Honorable Benson E. Legg
United States District Court
for the District of Maryland
Third Floor, Room 340
101 W. Lombard Street
Baltimore, MD 21201


Re: In the Matter of the Complaint of Eternity Shipping Ltd., et al.
for Exoneration from or Limitation of Liability
Civil Action No.: L-01-CV-0250

Dear Judge Legg:

We have received Mr. Asperger's letter of February 24, 2006, and Mr. Bartlett's letter which was filed this morning. On behalf of the Limitation Plaintiffs, we fully concur with Mr. Bartlett's view. While it might be appropriate at this late date for counsel for Tate & Lyle to attempt to complete or clarify the record from the January 18 hearing, it is entirely improper for counsel to use that effort as an excuse to submit untimely argument.

Limitation Plaintiffs join in the request of the American Bureau of Shipping that the Court disregard the arguments contained in the letter of February 24, 2006 from counsel for Tate & Lyle. If the Court decides to consider those arguments, then we also request that Limitation Plaintiffs be given the opportunity to file a reply.

Respectfully yours,



M. Hamilton Whitman, Jr.

MHWJr/pkp

cc: All Counsel (by electronic filing)